
From: Manara, Kevin <Kevin.Manara@NFL.com>
Sent: Friday, September 30, 2016 2:08 PM
To: 'Carter, James'; David R. Vance
Cc: Carroll, Meghan; heather.mcphee@nflpa.com; Flanagan, Todd
(Todd.Flanagan@nflpa.com); Patrick J. Hoban; Stephen S. Zashin; Joanne M. Carney
Subject: RE: Lane Johnson's Pre-Hearing Statement (exhibits to follow separately)

Arbitrator Carter,

As we indicated during the discovery call, the protocols of the testing laboratory referenced on page 16 of the Policy are contained in the lab packet in the hearing binder. The lab packet was prepared consistent with the Standard Form of Documentation Package set forth in the Policy at Appendix G. Had Mr. Johnson's specimen tested positive for substances other than [REDACTED] the corresponding protocols would have been included in the lab packet. However, his specimen was only positive for [REDACTED] so only the [REDACTED] protocols were relevant and included.

REDACTED

Also, the UCLA lab is accredited by other testing organizations and thus is also subject to policies and standards which are not applicable to testing under the NFL Policy on Performance-Enhancing Substances. For example, the lab is accredited by WADA, and subject to WADA's International Standard for Laboratories, which Mr. Johnson produced. We have not produced it because while that document is relevant to testing UCLA performs for WADA, it is irrelevant to testing under the Policy.

Respectfully submitted,
Kevin Manara

From: Carter, James [mailto:James.Carter@wilmerhale.com]
Sent: Friday, September 30, 2016 10:28 AM
To: David R. Vance <drv@zrlaw.com>
Cc: Manara, Kevin <Kevin.Manara@NFL.com>; Carroll, Meghan <Meghan.Carroll@nfl.com>;
heather.mcphee@nflpa.com; Flanagan, Todd (Todd.Flanagan@nflpa.com) <Todd.Flanagan@nflpa.com>; Patrick J.
Hoban <pjh@zrlaw.com>; Stephen S. Zashin <ssz@zrlaw.com>; Joanne M. Carney <jmc@zrlaw.com>
Subject: RE: Lane Johnson's Pre-Hearing Statement (exhibits to follow separately)

Dear Counsel,

This is a clarification and modification of my Ruling on Discovery Requests and Objections of September 26, 2016. Mr. Johnson's Requests Nos. 2 and 3 seek production of testing laboratory "protocols" referenced on page 16 of the Policy and/or used by the UCLA Olympic Analytical Laboratory in 2016, and the NFL responded in its objections that documents responsive to those requests were produced as part of the laboratory packet contained in the Hearing Binder. If there are any other testing laboratory "protocols" referenced in the Policy or used by the UCLA lab that were applicable to the testing of samples such as the testing that was done of the sample provided by Mr. Johnson in July 2016, besides the documents contained in the Hearing Binder, the NFL is directed to produce them promptly to Mr. Johnson's counsel and the NFLPA.

Sincerely, James H. Carter

From: David R. Vance [mailto:drv@zrlaw.com]
Sent: Wednesday, September 28, 2016 5:34 PM

To: Carter, James

Cc: kevin.manara@nfl.com; Carroll, Meghan ([Meghan.Carroll@nfl.com](mailto: Meghan.Carroll@nfl.com)); heather.mcphee@nflpa.com; Flanagan, Todd ([Todd.Flanagan@nflpa.com](mailto: Todd.Flanagan@nflpa.com)); Patrick J. Hoban; Stephen S. Zashin; Joanne M. Carney

Subject: Lane Johnson's Pre-Hearing Statement (exhibits to follow separately)

Arbitrator Carter,

Lane Johnson's Pre-Hearing Statement is attached, which includes his list of witnesses. The exhibits were too large for a single email and will be sent in separate emails. Additionally, you and those cc'ed on this email will receive a hardcopy of the attached and a binder of exhibits tomorrow.

Best,
David



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